

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

Estate of VALERIE YOUNG by VIOLA YOUNG, :	
Valerie Young, as Administratrix of the :	
Estate of and in her personal capacity, :	DEFENDANTS' FIRST SET
et al., :	OF INTERROGATORIES
	TO PLAINTIFF
Plaintiffs, :	
-against- :	07-CV-6241 (LAK) (DCF)
	:
STATE OF NEW YORK OFFICE OF MENTAL :	
RETARDATION AND DEVELOPMENTAL :	
DISABILITIES, et al., :	
	:
Defendants. :	
	:
-----X	

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rules 26.3 and 33.3 of Rules of the United States District Courts for the Southern and Eastern Districts of New York, defendants State of New York Office of Mental Retardation and Developmental Disabilities ("OMRDD"), Brooklyn Developmental Disabilities Service Office ("BDDSO") Director Peter Uschakow, Deputy Director Operations Jan Williamson, Residential Unit Supervisor Gloria Hayes, Treatment Team Leader Kathleen Ferdinand and Medical Doctor Jovan Milos, and Hudson Valley Developmental Disabilities Services Office ("HVDDSO") Deputy Director Operations Suresh Arya, in their official capacities and individually (collectively "defendants"), by their attorney, Andrew M. Cuomo, Attorney General of the State of New York, hereby request that plaintiffs Estate of Valerie Young by Viola Young, as

EXHIBIT 7

time [sic] leading ultimately to her death."

7. Identify all persons with whom plaintiffs have had communications, including identifying oral communications as provided in Local Civil Rule 26.2 (a)(2)(B), concerning the allegation in paragraph "34" of the Complaint that "[t]he conduct of the Individual Defendants violated YOUNG'S rights under the Fourteenth Amendment to the United States Constitution."

8. Identify all persons with whom plaintiffs have had communications, including identifying oral communications as provided in Local Civil Rule 26.2 (a)(2)(B), concerning the allegation in paragraph "37" of the Complaint that "[a]s the result of the discriminatory acts and omissions of OMRDD and the Individual Defendants, decedent YOUNG was caused to suffer physical and emotional pain ultimately leading to her death."

9. Identify all persons with whom plaintiffs have had communications, including identifying oral communications as provided in Local Civil Rule 26.2 (a)(2)(B), concerning the allegation in paragraph "41" of the Complaint that "[a]s the result of the discriminatory acts and omissions of OMRDD and the Individual Defendants, decedent YOUNG was caused to suffer physical and emotional pain ultimately leading to her death."

10. Identify each person whom plaintiffs expect to call as an expert witness at trial and state the following for each:

(a) the subject matter on which the expert is

- expected to testify;
- (b) the substance of the opinions and conclusions to which the expert is expected to testify;
- (c) a summary of the grounds for each such opinion and conclusion; and
- (d) identify each expert's resume or curriculum vitae.

11. Identity each person, other than a person expected to testify as an expert witness, whom plaintiffs intend to call as a witness at trial, and for each such person, state the subject matters about which he or she is expected to testify.

12. Specify the total dollar amount of damages which plaintiff contends she sustained and for which she seeks recovery in this lawsuit and describe the manner in which this figure was calculated, including compensatory damages, e.g., economic losses, emotional injuries, physical injuries, disability and other damages, and punitive damages. Identify all documents relied upon in arriving at these damages.

13. Identify all medical and mental health practitioners and/or counselors (if any), including but not limited to doctors, nurse practioners, nurses, psychiatrists, psychologists, social workers, therapists and clergy members, whom plaintiffs have consulted or visited during the past ten years in connection with treatment for decedent Young, and for each such individual,